IN THE SUPREME COURT OF THE UNITED STATES

KANSAS,

Petitioner,

v.

RAMIRO GARCIA, DONALDO MORALES, AND GUADALUPE OCHOA-LARA, Respondents.

> On Writ of Certiorari to the Supreme Court of Kansas

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the American Federation of Labor and Congress of Industrial Organizations as *Amicus Curiae* in Support of the Respondents was prepared using Century 12-point typeface and contains 5,058 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 13, 2019.

Respectfully submitted,

Matthew J. Ginsburg (Counsel of Record) 815 Sixteenth Street NW Washington, DC 20006 (202) 637-5397 mginsburg@aflcio.org